

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Trustees of the Electrical Welfare  
Trust Fund, et al.

Plaintiffs,

v.

Tri Tech Electrical Services Inc.

**Civil No. MJG 03CV308**

Defendant.

**AFFIDAVIT OF JULIE LINKINS**

Julie Linkins, being first duly sworn upon oath, deposes and states that:

1. I am employed at the Local 26, IBEW-NECA Trust Funds Office as the Accounting Manager with respect to the Electrical Welfare Trust Fund ("Welfare Fund"); Electrical Workers Local No. 26 Pension Trust Fund ("Pension Fund"); Electrical Workers Local No. 26 Joint Apprenticeship and Training Trust Fund ("JATC"); Electrical Workers Local 26 Individual Account Plan ("IA Fund"); National Electrical Benefit Fund ("NEBF"), and the National and Local Labor Management Cooperation Committee ("NLMCC" and "LMCC").

2. In that capacity, I am responsible for monitoring and maintaining records with respect to monthly contribution reports and payments made by electrical contractors like Tri Tech Electrical Services Inc.



3. With respect to work performed during February 2003 through the present, Tri Tech Electrical Services Inc. failed to pay contributions. Contributions for January 2003 have not been paid in full. Therefore, the following contribution amounts are owed:

WELFARE FUND	PENSION FUND	JATC	IA FUND	NEBF
\$9,637.28	\$5,940.78	\$1,645.14	\$6,489.89	\$4,020.81

4. For the months of October 2001 through the present, Tri Tech Electrical Services Inc. was assessed liquidated damages at a rate of 20% of the contributions and interest from the date due through the date paid as follows:

WELFARE FUND	PENSION FUND	JATC	IA FUND	NEBF
\$16,544.44	\$6,243.87	\$2,699.98	\$10,670.36	\$5,610.50

5. For the months of January 2003 through the present, Tri Tech Electrical Services Inc. owes \$ 1,640.30 for Working Dues.

6. For the months of January 2003 through the present, Tri Tech Electrical Services Inc. owes \$ 55.03 to the National Labor Management Cooperation Committee.

7. For the months of January 2003 through the present, Tri Tech Electrical Services Inc. owes \$ 275.15 to the Labor Management Cooperation Committee.